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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 XAVIER WILSON,
15 Defendant.

Case No. 2:21-cr-00304-RFB-VCF

**STIPULATION TO MODIFY
CONDITIONS OF RELEASE**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Sue Fahami, Acting
18 United States Attorney, through Daniel J. Cowhig, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and Aden
20 Kahssai, Assistant Federal Public Defender, counsel for Xavier Wilson, that this Court amend
21 the conditions of his release.

22 This Stipulation is entered into for the following reasons:

23 1. On February 3, 2025, this Court held a hearing for revocation of supervised
24 release.¹ At that hearing, the parties recommend a proposed resolution whereby Mr. Wilson
25 agreed to a modification of sixty days in the Residential Reentry Center (RRC). Defense
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¹ See ECF No. 73.

counsel also informed the Court that Mr. Wilson obtained employment as instructed. The parties further recommended the Court dismiss the petition without prejudice. The Court followed the parties' recommendations.²

2. Defense counsel requested a status check halfway through Mr. Wilson's placement at the RRC so that if he was in compliance, his placement would end at that time. Therefore, the Court set a status conference for March 25, 2025.³

3. Mr. Wilson entered the RRC on February 20, 2025. The March 25th status conference would be the halfway mark of Mr. Wilson's condition to reside at the RRC. Subsequently, due to a conflict in the Court's schedule, the Court vacated the status conference and reset the hearing to April 17, 2025.⁴

4. The parties, including the Probation Office, have conferred and agree that the modification requiring Mr. Wilson reside at the RRC be removed effective March 25, 2025, in the absence of a new petition being filed before that date by the Probation Office.

DATED this 6th day of March 2025.

RENE L. VALLADARES
Federal Public Defender

SUE FAHAMI
Acting United States Attorney

By /s/ Aden Kahssai

By /s/ Daniel J. Cowhig

ADEN KAHSSAI
Assistant Federal Public Defender

Daniel J. Cowhig
Assistant United States Attorney

² *Id.*

³ *Id.*

⁴ ECF No. 74.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,
v.
XAVIER WILSON,
Defendant.

Case No. 2:21-cr-00304-RFB-VCF

ORDER

IT IS HEREBY ORDERED, that this Court amend Xavier Wilson's supervised release condition that he must reside in a Residential Reentry Center (RRC) for a term of up to 60 days to allow Mr. Wilson's placement at the RRC to end effective March 25, 2025. The Status Conference set for April 17, 2025 is VACATED.

DATED this 21st, day of March 2025



UNITED STATES DISTRICT JUDGE